## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF LOUISIANA

IN RE: TAXOTERE (DOCETAXEL)	: MDL NO. 2740		
PRODUCTS LIABILITY LITIGATION	: SECTION "N"(5)		
	: JUDGE ENGELHARDT		
	: MAG. JUDGE NORTH		
Plaintiff(s),	: COMPLANT & JURY DEMAND :		
V.	: Civil Action No.:		
VS.	: :		
	:		
	: :		
Defendant(s).	:		
	•		
SHORT FORM CO	<u>OMPLAINT</u>		
Plaintiff(s) incorporate by reference the Mas	ster Long Form Complaint and Jury Demand		
filed in the above-referenced case on March 31, 20	017. Pursuant to Pretrial Order No. 15, this		
Short Form Complaint adopts allegations and enc	ompasses claims as set forth in the Master		
Long Form Complaint against Defendant(s).			
Plaintiff(s) further allege as follows:			
1. Plaintiff:			
2. Spousal Plaintiff or other party making los	s of independent/secondary claim (i.e., loss		
of consortium):			
,			

	er type of ervator):		iff and capacity (i.e., administrator, executor, guardian,
	ent State	of Re	sidence:
			ntiff(s) allege(s) injury:
Defe	endants (	check a	all Defendants against whom a Complaint is made):
a.	Taxo	tere Br	and Name Defendants
		A.	Sanofi S.A.
		B.	Aventis Pharma S.A.
		C.	Sanofi US Services Inc. f/k/a Sanofi-Aventis U.S. Inc
		D.	Sanofi-Aventis U.S. LLC
b.	Other	Brand	Name Drug Sponsors, Manufacturers, Distributors
		A.	Sandoz, Inc.
		B.	Accord Healthcare, Inc.
		C.	McKesson Corporation d/b/a McKesson Packaging
		D.	Hospira Worldwide Inc.
		E.	Hospira Inc
		F.	Sun Pharma Global FZE
		G.	Sun Pharma Global Inc.
		H.	Caraco Pharmaceutical Laboratories Ltd.
		I.	Pfizer Inc.
		J.	Allergan Finance LLC f/k/a Actavis Inc.
		K.	Actavis Pharma Inc.

			L.	Other:	
7.	Basis	s for Jur	isdictio	n:	
		Dive	rsity of	Citizenship	
					pasis for jurisdiction must be pled in sufficient detail as ble Federal Rules of Civil Procedure):
8.	Venu	ie:			
	have		ise filed		which remand and trial is proper and where you might t Form Complaint absent the direct filing Order entered
9.	Branc	d Produ	ct(s) us	ed by Plain	ntiff (check applicable):
		A.	Taxo	tere	
		B.	Doce	efrez	
		C.	Doce	etaxel Inject	tion
		D.	Doce	etaxel Inject	tion Concentrate
		E.	Unkn	nown	
		F.	Other	r:	

	e and last date of use (or approximate date range, if specific ) for Products identified in question 9:
State in w	which Product(s) identified in question 9 was/were administered:
	re and extent of alleged injury (including duration, approximate of onset (if known), and description of alleged injury):
Cour	nts in Master Complaint brought by Plaintiff(s):
	Count I – Strict Products Liability - Failure to Warn Count II – Strict Products Liability for Misrepresentation Count III – Negligence Count IV – Negligent Misrepresentation Count V – Fraudulent Misrepresentation Count VI – Fraudulent Concealment Count VII – Fraud and Deceit Count VIII – Breach of Express Warranty (Sanofi Defendants only)
	Other: Plaintiff(s) may assert the additional theories and/or State Causes of Action against Defendant(s) identified by selecting "Other" and setting forth such claims below. If Plaintiff(s) includes additional theories of recovery, for example, Redhibition under Louisiana law or state consumer protection claims, the specific facts and allegations supporting additional theories must be pleaded by Plaintiff in sufficient detail as required by the applicable Federal Rules of Civil Procedure.

14.	Name of Attorney(s), Bar Number(s), Law Firm(s), Phone Number(s),
	Email Address(es) and Mailing Address(es) representing Plaintiff(s):
	By: